# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

#### BEFORE THE COMMISSION

In the Matter of
Luminant Generation Company, LLC
Comanche Peak Nuclear Power Plant
Units 3 and 4
Combined License Adjudication

Docket Nos. 52-034 and 52-035 August 11, 2011

### **DECLARATION OF STANDING**

Under penalty of perjury, Tom "Smitty" Smith declares as follows:

- 1. My name is Tom "Smitty" Smith. I am the Executive Director of Public Citizen Texas. A Public Citizen Texas member, Don Young, has previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. Don Young lives within fifty (50) miles of the Comanche Peak 3 & 4 site.
- 2. Mr. Young authorized Public Citizen Texas to represent his interests regarding issuance of the Combined License to the Applicant in this docket. Public Citizen Texas continues to represent the interests of Mr. Young in this docket. There has been no substantial change in our organization's status or its standing regarding its participation in this proceeding. Moreover, there has been no material change in the factual bases upon which Mr. Young's standing was based, including, without limitation, the proximity of his residence to the Comanche Peak 3 & 4 site.
- 3. I have authorized Kauffman & Eye to represent Public Citizen's interests in this proceeding.

Tom "Smitty" Smith

Date

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

### **BEFORE THE COMMISSION**

In the Matter of Luminant Generation Company, LLC Comanche Peak Nuclear Power Plant Units 3 and 4 Combined License Adjudication

Docket Nos. 52-034 and 52-035 August 11, 2011

#### **DECLARATION OF STANDING**

Under penalty of perjury, Karen Hadden declares as follows:

- 1. My name is Karen Hadden. I am the Executive Director of the Sustainable Energy and Economic Development Coalition (SEED Coalition).
- 2. A SEED Coalition member, Nita O'Neal, has previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. Nita O'Neal lives within fifty (50) miles of the Comanche Peak 3 & 4 site. Ms.O'Neal authorized SEED Coalition to represent her interests regarding issuance of the Combined License to the Applicant in this docket. SEED Coalition continues to represent the interests of Ms. O'Neal in this docket. There has been no substantial change in our organization's status or its standing regarding its participation in this proceeding. Moreover, there has been no material change in the factual bases upon which Ms. O'Neal's standing was based, including, without limitation, the proximity of her residence to the Comanche Peak 3 & 4 site.
- 3. I have authorized Kauffman & Eye to represent my organization's interests in this proceeding.

Karen Hadden

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Docket Nos. 52-034 and 52-035 August 11, 2011

### **DECLARATION OF STANDING**

Under penalty of perjury, Nita O'Neal declares as follows:

- 1. My name is Nita O'Neal. I am a member of the Sustainable Energy and Economic Development Coalition (SEED Coalition).
- 2. I have previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. I live within fifty (50) miles of the Comanche Peak 3 & 4 site. I have authorized SEED Coalition to represent my interests regarding issuance of the Combined License to the Applicant in this docket. SEED Coalition continues to represent my interests in this docket. There has been no substantial change in our organization's status or its standing regarding its participation in this proceeding. Moreover, there has been no material change in the factual bases upon which my standing was based, including, without limitation, the proximity of my residence to the Comanche Peak 3 & 4 site.
- 3. I agree with the authorization of Kauffman & Eye to represent SEED Coalition's interests in this proceeding.

Nita O'Neal

Vita O'Nest

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#### **BEFORE THE COMMISSION**

In the Matter of Luminant Generation Company, LLC Comanche Peak Nuclear Power Plant Units 3 and 4 Combined License Adjudication

Docket Nos. 52-034 and 52-035 August 11, 2011

### **DECLARATION OF STANDING**

Under penalty of perjury, Lon Burnam declares as follows:

- 1. My name is Lon Burnam. I have previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. I adopt herein the statements I made in the Declaration filed on my behalf on April 4, 2009, in this docket.
- 2. I continue to reside within 40 miles of the Comanche Peak 3 & 4 site. My address is 2103 6<sup>th</sup> Ave., Ft. Worth, Texas 76110.
- 3. I have authorized Kauffman & Eye to represent my interests in this proceeding.

Lon Burnam

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Date